

instant claimed invention. Applicant's claimed disk-shaped pouch with indicia tab is provided in contemplation of a system of cataloguing, using rotational displacement of the indicia tabs in the plurality configuration of Applicant's claims 11 and 12. Reinhold and Balzer have nothing to do with rotational indicia tabs in order to motivate one skilled to arrive at the pouch with indicia tab in claims 14 and 15. Balzer's limited teaching is to use a rectangular filing system in a box housing and fails to suggest or disclose otherwise to support allegations of obviousness of the instant claims. In Balzer one must thumb *through* the index of linear tabs, front to rear. This filing system differs significantly from the Applicant's system of rotational sorting and cataloguing, which relies on the concept of rotational movement or side-to-side thumbing of indicia tabs. Balzar and Reinhold fail to suggest or disclose the concept of rotation and Reinhold prefers that one read the indicia on the record case itself. Without any suggestion or disclosure for rotational storing and retrieval, there is absent in the prior art the requisite motivation to modify Reinhold in spite of placing indicia on the face of the record case itself as taught by Reinhold.

The Examiner argues that it would be obvious to modify Reinhold in view of Balzer, since this would allow a plurality of pouches to be stored and located in an easier, faster, and more convenient manner; but such convenience can only be appreciated by reference to Applicant's disclosure using hindsight.

Lacking sufficient disclosure to lead one skilled in the art to the plurality of disk-shaped pouches with indicia tabs, as instantly claimed, the Casey and Kawachi references are immaterial. Moreover, the Kohn patent *requires* that the center hole of the sleeve is larger than the center hole of the record as pointed out above and, as such, teaches away

from Applicant's claim 15.

Respectfully submitted,

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